

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

DALLAS DIVISION

UNITED STATES OF AMERICA

v.

RUBENHAY PINKHASOV

CRIMINAL NO. 3:19-CR-316-B

DEFENDANT’S NOTICE OF COURT CONFLICT AND
REQUEST TO RESCHEDULE SENTENCING HEARING

Defendant, RUBENHAY PINKHASOV, respectfully requests the September 10, 2020, sentencing hearing be rescheduled due to his counsel’s court conflict. In support, the Defendant states the following:

1. Sentencing in this matter is currently scheduled for September 10, 2020. The defendant is not in custody.
2. Defendant’s counsel was previously scheduled to appear in Broward County, Florida, on September 10, 2020, for a special set hearing before Chief Judge Jack Tuter in the matter styled *Emerald Clinton, LLC, Et Al. v. Boardwalk Properties, Management, Inc.*, Case Number 17-021162 (07), 17th Judicial Circuit in and for Broward County, Florida. The *Emerald Clinton, LLC* hearing was specially set by the Court after consulting the schedules of six other attorneys. (A copy of the Court’s May 19, 2020, scheduling notice is attached hereto as Exhibit “A”).

3. Defendant respectfully requests this Court reschedule the September 10, 2020 Sentencing Hearing for any of the dates listed below, which dates have been cleared with counsel for the U.S. Government, AUSA Ryan Raybould:

September 14, 2020
September 22, 2020
September 23, 2020
September 24, 2020

4. The Government – through AUSA Ryan Raybould - has indicated no opposition to this rescheduling request. Accordingly, the Defendant respectfully requests that the September 10, 2020 sentencing hearing in this matter be rescheduled.

Respectfully submitted,

PODHURST ORSECK, P.A.
SunTrust International Center
One SE Third Avenue, Suite 2300
Miami, FL 33131
Phone: (305) 358-2800
Fax No: (305) 358-2382

By: s/ Robert C. Josefsberg
Robert C. Josefsberg
Fla. Bar No. 040856
rjosefsberg@podhurst.com

*Pro Hac Vice Counsel for Defendant, Ruben hay
Pinkhasov*

CERTIFICATE OF CONFERENCE

I hereby certify that on June 15, 2020, I conferred with counsel for the defendant, who indicated that he is unopposed to this request.

lsl Robert C. Josefsberg
ROBERT C. JOSEFSBERG
Pro Hac Vice Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2020, a true and correct copy was filed electronically through ECF on all parties of record named on the below Service List.

Is! Robert C. Josefsberg

ROBERT C. JOSEFSBERG

Pro Hac Vice Counsel for Defendant

SERVICE LIST

AUSA Ryan R. Raybould
Kansas Bar No. 25429
1100 Commerce, Suite 300
Dallas, Texas 75242
Telephone: 214.659.8713
Facsimile: 214.767.4104
Ryan.raybould2@usdoj.gov

Senior U.S. Probation Officer Daniel Jones
Dallas, TX
Telephone: 214.753.2549
daniel_jones@txnp.uscourts.gov

FBI Special Agent Daniel Gimenez
c/o AUSA Ryan R. Raybould
Ryan.raybould2@usdoj.gov